Spill Prevention Control and Countermeasure Inspection Findings, Alleged Violations, and Proposed Penalty Form

(Note: Do not use this form if there is no secondary containment)

These Findings, Alleged Violations and Penalties are issued by EPA Region 6 under the authority vested in the Administrator of EPA by Section 311(b)(6)(B)(I) of the Clean Water Act, as amended by the Oil Pollution Act of 1990

Company Name: Cook Composites + Polymers

Docket Number: OPA- -

Facility Name: Marshall Facility

Date: 8/12/98

Address: 5851 FM 1998

Inspection Number: FY-INSP-

City: Marshall

Inspectors Name: Randy Green

State: TX Zip Code: 75672

EPA Approving Official:

Contact: Bill Tiller

Enforcement Contacts:

James Graham Phone Number: (214)665-2272
Roger Hartung Phone Number: (214)665-8561

Summary of Findings

(Bulk Storage Facilities)

GENERAL TOPICS: 112.3(d), (e); 112.5(a), (b), (c); 112.7 (b), (c), (d)
(When the SPCC Plan review penalty exceeds $1,000.00 enter only the minimum allowable of $1,000.00.)

- [x] No Spill Prevention Control and Countermeasure Plan
- [ ] Plan not certified by a professional engineer
- [ ] Plan not maintained on site (applies if facility is manned at least eight (8) hours per day)
- [ ] Plan not available for review
- [ ] No evidence of three-year review of plan by owner/operator
- [ ] No plan amendment(s) if the facility has had a change in: design, construction, operation, or maintenance which affects the facility's discharge potential
- [ ] Amendment(s) not certified by a professional engineer
- [ ] Inadequate or no prediction of equipment failure which could result in discharges
- [ ] Plan does not discuss appropriate containment/diversionary structures equipment

Claiming installation of appropriate containment/diversionary structures is impractical but:

- ☐ No contingency plan
- ☐ No written commitment of manpower, equipment, and materials

Written Procedures and Inspection Records 112.7(e)(8)

- ☐ Inspections required by 40 CFR Part 112 are not in accordance with written procedures developed for the facility
- ☐ Written procedures and a record of inspections are not signed by facility supervisor
- ☐ Written procedures and a record of inspections are not made part of the plan
- ☐ Written procedures and a record of inspections are not maintained for three years

Personnel Training and Spill Prevention Procedures 112.7(e)(10)

- ☐ No training on the operation and maintenance of equipment to prevent discharges
- ☐ No training on the applicable laws, rules, and regulations
- ☐ No designated person responsible for spill prevention
- ☐ Spill prevention briefings are not scheduled and conducted periodically
- ☐ Plan has inadequate or no discussion of personnel and spill prevention procedures

FACILITY DRAINAGE, ONSHORE (excluding Production Facilities) 112.7(e)(1)

- ☐ Valves used to drain diked areas are not of manual, open-and-closed design (note: flapper-type valves should not be used).
- ☐ Pumps or ejectors not manually activated when diked storage areas drained
- ☐ Drainage from undiked areas not into ponds, lagoons, or catchment basins, or no diversion systems to return spills to the facility.
- ☐ Plan has inadequate or no discussion of facility drainage

BULK STORAGE TANKS (excluding Production Facilities) 112.7(e)(2)

- ☐ Material and construction of tanks not compatible to the material stored and the conditions of storage such as pressure and temperature.
- ☐ Secondary containment appears to be grossly inadequate.
- ☐ Materials of construction are not sufficiently impervious
- ☐ Excessive vegetation which affects the integrity of the containment system

☐ Walls of containment system are slightly eroded or have low areas

When drainage from diked areas is to a storm drain, open water course, or lake or pond:

☐ Bypass valve not normally sealed closed

☐ Runoff rain water not inspected and/or will cause a harmful discharge as defined in 40 CFR 110.

☐ Bypass valve is not opened and resealed under responsible supervision

☐ Adequate records of drainage events are not maintained

☐ Underground tanks are not protected from corrosion or are not subjected to regular pressure testing.

☐ Partially buried tanks do not have buried sections protected from corrosion.

☐ Aboveground tanks not subject to periodic integrity testing, such as visual, hydrostatic, and nondestructive methods, etc.

☐ Outside of tank not frequently observed for signs of deterioration, leaks which might cause a spill, or accumulation of oil inside diked area.

☐ Steam return /exhaust of internal heating coils which discharge into an open water course not monitored, passed through a settling tank, skimmer, or other separation system.

☐ Records of inspections of aboveground tanks are not maintained.

Tanks are not "fail-safe" engineered:

☐ No audible or visual high liquid level alarm, or

☐ No high-level pump cutoff devices set to stop flow at a predetermined tank content level, or

☐ No direct communications between tank gauger and pumping station, or

☐ No fast response system for determining liquid levels, such as computers, telepulse, or direct vision gauges.

☐ No testing of liquid level sensing devices to ensure proper operation

☐ Disposal facilities which discharge plant effluents directly to navigable waters are not monitored frequently to detect oil spills

☑ Visible oil leaks resulting in accumulations of oil in diked areas are not promptly corrected

☐ Mobile or portable storage tanks are not positioned to prevent spilled oil from reaching navigable water, or are in area subject to flooding.

☐ Secondary containment inadequate for mobile or portable storage tanks

☐ Plan has inadequate or no discussion of bulk storage tanks

FACILITY TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES, ONSHORE (excluding Production Facilities) 112.7(e)(3)

☐ Buried piping not corrosion protected with protective wrapping, coating, or cathodic protection.

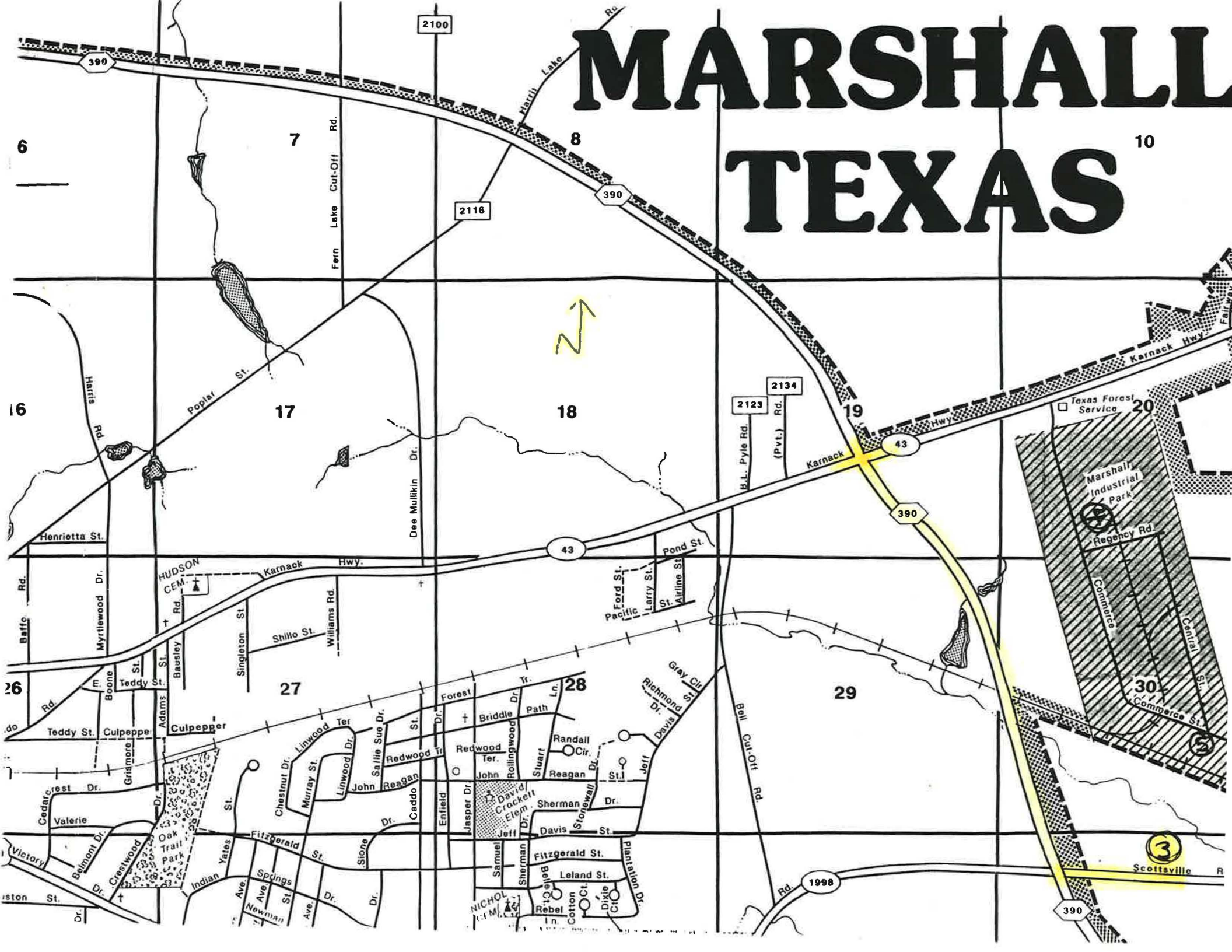
- ☐ Corrective action not taken on buried piping when corrosion damage found
- ☐ Terminal connections at transfer points on not-in-service or standby pipelines are not capped or blank-flanged and marked as to origin
- ☐ Pipe supports are not properly designed to minimize abrasion and corrosion, and allow for expansion and contraction.
- ☐ Aboveground valves and pipelines are not inspected regularly
- ☐ Periodic pressure testing of the valves and pipelines is not conducted
- ☐ Vehicle traffic not warned verbally or by appropriate signs of aboveground piping.
- ☐ Plan has inadequate or no discussion of facility transfer operations, pumping, and in-plant processes.

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK, ONSHORE 112.7(e)(4)

- ☐ Inadequate secondary containment, and/or rack drainage does not flow to catchment basin, treatment system, or quick drainage system
- ☐ Containment system does not hold at least the maximum capacity of the largest single compartment of any tank car or tank truck
- ☐ There is no interlocked warning light, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect from transfer lines
- ☐ There is no inspection of lowermost drains and all outlets prior to filling and departure of any tank car or tank truck.
- ☐ Plan has inadequate or no discussion of facility tank car and tank truck loading/unloading rack.
- ☐ Facility not fully fenced and entrance gates are not locked and/or guarded when plant is unattended or not in production.

SECURITY (excluding Production Facilities) 112.7(e)(9)

- ☐ Master flow and drain valves that permit direct outward flow of tank's contents to the surface are not secured in closed position when in a non-operating or standby status.
- ☐ Starter controls on pumps are not locked in the "off" position or located at a site accessible only to authorized personnel when pumps are not in a non-operating or standby status.
- ☐ Loading and unloading connection(s) of pipelines are not capped or blank-flanged when not in service.
- ☐ Facility lighting not commensurate with the type and location of facility to facilitate the discovery of spills during hours of darkness and to deter vandalism.
- ☐ Plan has inadequate or no discussion of facility security.


MARSHALL
TEXAS
6
7
8
10
16
17
18
19
20
26
27
28
29
30
390
2100
2116
2134
2123
43
Fern Lake Cut-Off Rd.
Harrill Lake Rd.
Poplar St.
Harris Rd.
Dee Mullikin Dr.
B.L. Pyle Rd.
(Pvt.) Rd.
Karnack
Karnack Hwy
Texas Forest Service
Marshall Industrial Park
Regency Rd.
Commerce
Central
Commerce St.
Henrietta St.
HUDSON CEM.
Karnack Hwy.
Pond St.
Pacific
Ford St.
Larry St.
Airline St.
Myrtlewood Dr.
Baffo Rd.
Bausley St.
Williams Rd.
Singleton St
Shillo St.
E. Boone
Teddy St.
Culpepper
Adams
Gridmore
Cedarcrest Dr.
Valerie
Belmont Dr.
Victory
Oak Trail Park
Crestwood
Indian
Yates
Springs
Ave.
Newman
Fitzgerald St.
Stone
Chestnut Dr.
Linwood Ter
Linwood Dr.
Murray St.
Sallie Sue Dr.
John Reagan
Redwood Tr.
Redwood Ter.
Forest Tr.
Briddle Path
Rollingwood Dr.
Stuart Dr.
Randall Cir.
Reagan St.
Jeff Davis
Richmond Dr.
Gray Cir.
Caddo Dr.
Enfield
Jasper Dr.
David Crockett Elem.
Sherman Dr.
Stonewall Dr.
Jeff Davis St.
Samuel
Sherman
Fitzgerald St.
Leland St.
Bell Cut-Off Rd.
Plantation Dr.
Rebel Ln.
Cotton Ct.
Dixie Cir.
NICHOL CEM.
Rd. 1998
Scottsville
3

SPCC - EXPEDITED FIELD ENFORCEMENT PROGRAM

Owner/Operator: Cook Composites & Polymers **SPCC case number:** 980264

Phone number: (903) 938-9571

Address: Mail: Rt. 6 Box 615 Marshall, TX 75672

Physical: 5851 FM Road 1998

Contact: Bill Tiller, Plant ~~Manager~~ Supervisor

Contact phone number: ~~(903) 939-34~~ RG

Date of contact:

Date and time of scheduled inspection: 8/12/98 1:00 pm

SPCC Plan: Yes ____ No ____

Tank battery location: N 32° 32.701' W 94° 17.756'

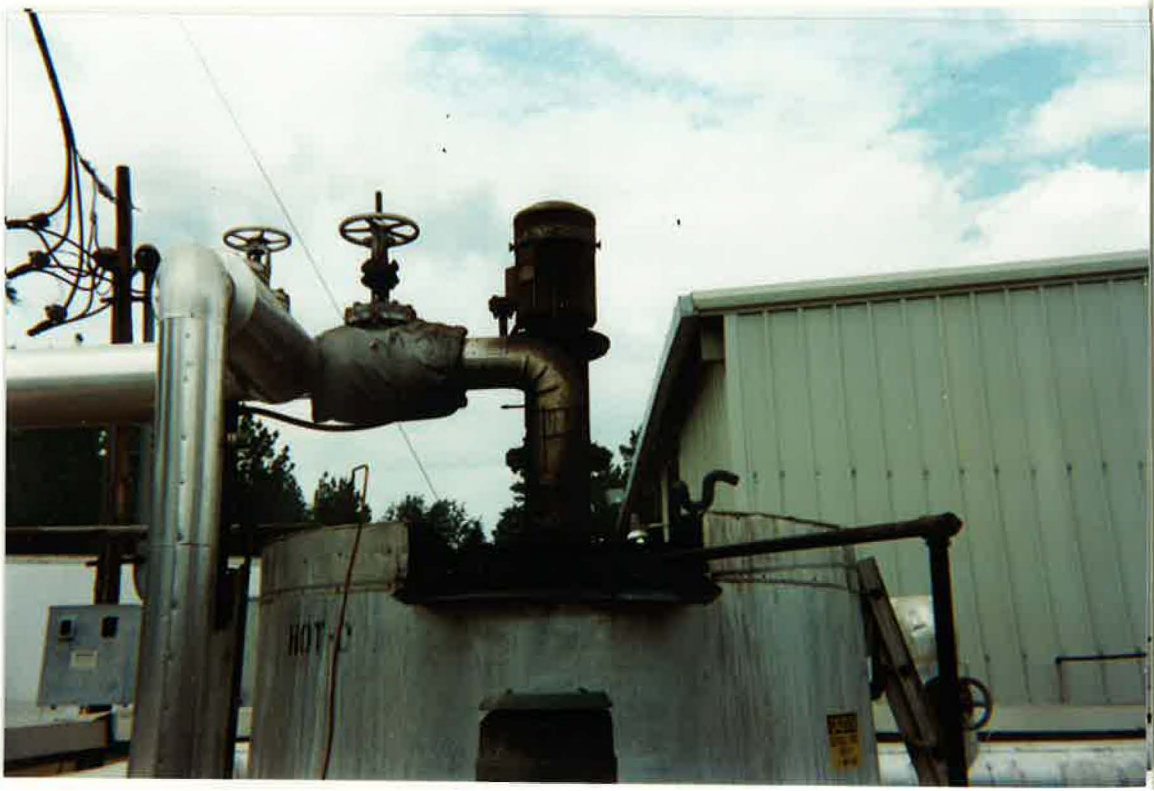
From the intersection of Loop 390 and Hwy 43, travel south on Loop 390 to FM Rd. 1998 (a.k.a. Scottsville Road) (L) turn onto FM 1998 and travel 1/2 - 1 mile. Cook will be on the (L) hand side of the road

Comments:

8/4/98 13:05 START Wakefield could not get the man who answered the phone to tell whether or not there was any type of oil or oil products on site.

SITE NAME: M all/Longview SPCC TDD#: S06-9802-008
PHOTO#: 104 HOTOGRAPHER/WITNESS: Green/Hood
DATE: 08/12/98 TIME: 1330 DIRECTION: s
Cook Polymer heat transfer storage tank standing water in secondary containment

SITE NAME: Marshall/Longview SPCC TDD#: S06-9802-008
PHOTO#: 105 PHOTOGRAPHER/WITNESS: Green/Hood
DATE: 08/12/98 TIME: 1330 DIRECTION: w
staining from product on top of tank



SITE NAME: SPCC Recon for Gregg Co. TDD#: S06-9802-008
PHOTO#: 107 PHOTOGRAPHER/WITNESS: Wakefield/Green
DATE: 07/29/98 TIME: 1213 DIRECTION: W
Overview of Cook Composites and Polymers

SITE NAME: SPCC Recon for Gregg Co. TDD#: S06-9802-008
PHOTO#: 108 PHOTOGRAPHER/WITNESS: Wakefield/Green
DATE: 07/29/98 TIME: 1213 DIRECTION: W
Overview of Cook Composites and Polymers

SITE N .: Marshall/Longview SPCC TDD#: S06-9802-00
PHOTO#. 106 PHOTOGRAPHER/WITNESS: Green/Hood
DATE: 08/12/98 TIME: 1335 DIRECTION: s
overview of heat transfer tank